

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

WAYNE BALIGA, derivatively on behalf of  
LINK MOTION INC. (F/K/A NQ MOBILE  
INC.)

Plaintiff,

-against-

LINK MOTION INC. (F/K/A NQ MOBILE  
INC.), VINCENT WENYONG SHI, JIA  
LIAN,  
XIAO YU,

Defendants,

-and-

LINK MOTION INC. (F/K/A NQ MOBILE  
INC.),

Nominal Defendant.

1:18-cv-11642-VM-DCF

**DECLARATION OF DEFENDANT  
VINCENT WENYONG SHI IN SUPPORT  
OF MOTION FOR DECLARATORY  
RELIEF AND MODIFICATION OF THE  
RECEIVERSHIP ORDER**

VINCENT WENYONG SHI declares, pursuant to 28 U.S.C. 1746, as follows:

1. I am an Individual Defendant in the above-captioned action and am a director of the nominal defendant Link Motion Inc. (the “Company”). I make this declaration in support of the motion for declaratory relief and modification of the receivership order.

2. I have reviewed the proposed Complaint against DLA Piper LLP (US), Caryn Schechtman and Marc A. Silverman (together, the “DLA Defendants”). To the best of my knowledge, the allegations therein are true and accurate and as to those matters not within my personal knowledge, I believe them to be true.

3. I consent to the modification of paragraph 2(e) of the receivership order to permit me, in my capacity as a director of the Company, to retain counsel to bring an action on behalf of the Company against the DLA Defendants for legal malpractice and breach of fiduciary duty.

I state under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: March 1, 2021



Vincent Wenyong Shi